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May 9, 2025

VIA ECF

Hon. Jennifer H. Rearden, U.S.D.J.
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Application GRANTED.

SO ORDERED.

Jennifer H. Rearden, U.S.D.J.
Dated: May 11, 2025

Dear Judge Rearden,

I write on behalf of plaintiff the City of New York (“City” or “Plaintiff”) in the above captioned matter. I write with consent of Defendants to request leave to file a second amended complaint and to set forth a proposed schedule to which Plaintiff and Defendants have agreed.

As the Court is familiar, this case concerns the Shelter and Services Program (“SSP”) grants that defendant FEMA awarded to the City for federal fiscal years 2023 and 2024. Plaintiff seeks to amend the complaint because defendants issued a letter dated April 1, 2025 terminating the City’s SSP grant awards. The City intends to challenge that termination and the City believes that challenge should be part of the present case. Defendants consent to the City’s request for leave to file a second amended complaint.

Counsel for Plaintiff and Defendants have conferred and propose the following schedule:

Plaintiff to file amended complaint on or before June 13, 2025

Defendants to file responsive pleading or motion on or before July 18, 2025

If Defendants file a motion to dismiss, Plaintiff's opposition will be due August 25, 2025 and Defendants' reply will be due September 12, 2025.

We thank the Court for its consideration.

Respectfully submitted,

Joshua P. Rubin
Senior Counsel

cc: via ECF and/or electronic mail to Andrew Warden, Syed Ahmad (counsel for Defendants)